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BENJAMIN B. XUE  
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January 19, 2024

**Via ECF**

Honorable Magistrate Judge Taryn A. Merkl, U.S.M.J  
United States District Court, E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Zhang et al v. YSF Holdings LLC et al  
Case No.: 1:21-cv-06597**

Dear Judge Merkl:

This office represents Plaintiffs in the above-referenced action. We write to you regarding the status of the case. The undersigned called and emailed Defendant's counsel before filing this letter but received no response. Therefore, this letter is submitted without input from Defendant's counsel.

The Court held a status conference on November 7, 2023. A Minute Order was entered on the same date directing Defendant Wong to response to the deficiency letter served in September 2022 within 10 days. The Court has previously set several deadlines for Defendant to respond to the same letter several times and all the orders were ignored without consequence. The same Minute Order also urged party to schedule Defendant Wang's deposition. Unfortunately, Defendant's counsel continued to ignore the Court Order and continued to ignore Plaintiff's counsel's correspondence. As of today, Defendant still failed to respond to the deficiency letter and failed to respond to Plaintiff's request to schedule Defendant Man Chung

Wong's deposition.

Basically, the case is at the same status as November 7, 2023. There is no settlement discussion among the parties. Plaintiff does not believe a new mediation session would be successful. However, Plaintiff would certainly appreciate it if the Court is willing to hold a settlement conference on this case under these circumstances.

Respectfully submitted,

/s/ Benjamin B. Xue  
Benjamin B. Xue

Cc: all counsel of record *via* ECF